



State of Utah

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Office of the Governor  
PUBLIC LANDS POLICY COORDINATING OFFICE

KATHLEEN CLARKE  
*Director*

February 10, 2017

*Sent via email: [khoffman@blm.gov](mailto:khoffman@blm.gov)*

Kent Hoffman  
Deputy State Director  
Division of Lands and Minerals  
Bureau of Land Management, Utah State Office  
440 West 200 South, Suite 500  
Salt Lake City, Utah 84114-1107

Subject: June 2017 Competitive Oil and Gas Lease Sale  
DOI-BLM-UT-C020-2017-0001-EA

Dear Mr. Hoffman:

The State of Utah appreciates the opportunity to review and comment on the June 2017 Competitive Oil and Gas Lease Sale Environmental Assessment (EA). The sale of twenty parcels together comprise approximately 23,733 acres of public land located in Garfield, Piute, Sanpete, and Sevier Counties.

The State supports Alternative A, the Proposed Action, leasing all twenty parcels. Alternative A complies with the Federal Onshore Oil and Gas Leasing Reform Act of 1987, which directs the BLM to conduct quarterly oil and gas sales in each state whenever eligible lands are available for leasing. While the State supports Alternative A, the (NSO) stipulations would essentially sterilize the leases from oil or gas development.

The EA sets forth the expected lease of twenty parcels, nine of which are proposed to be leased under a no surface occupancy (NSO) designation due to their proximity to priority sage grouse habitat. The EA provides inadequate analysis for these nine parcels. This includes parcels 007, 008, 017, 018, 019, 020, 023, 024, and 025. In Section 2.2 of the EA, the BLM discusses its assumption that putting one well-pad on each of the eleven non-NSO parcels would allow adequate access to resources within the NSO parcels. DOGM considers this an improper assumption.

The State is concerned with BLM's over-reliance on the use of directional drilling in

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the EA. While directional drilling can allow extraction under parcels that have no surface disturbance, such extraction is limited or negated at long distances. Map 3 on page 70 of the EA shows that the nine NSO parcels would require access from well-pads at distances of upwards of 2 or 3 miles. These distances are not possible for horizontal extraction for the NSO parcels, therefore, these parcels are rendered as the equivalent of non-leased lands. Additional technical analysis must be completed to identify the accessibility of resources in the nine NSO-designated parcels. If BLM does not have access to petroleum engineers and geologists with contemporary knowledge, the State's Division of Oil, Gas and Mining, along with the Utah Geologic Survey, are excellent resources that will be made available upon request.

Leasing these parcels will provide economic benefit to the local communities, counties, and the State. However, the State has a minor concern regarding the location of a number of the parcels included in the proposed sale. Four parcels encompass the shores of Otter Creek State Park located in Piute County. Oil and gas exploration undertaken on these parcels might conflict with recreational activities on and around the lake. The State recognizes that these parcels all have a no-surface occupancy lease stipulation which could eliminate potential conflicts. However, the State asks that the BLM continue to keep the State and Piute County aware of all leases sold and all corresponding Applications for Permit to Drill (APD) applied for as a result of the lease sale. This will ensure that both oil exploration and recreation can coexist without any unnecessary conflict. To reiterate, the State in no way wants to impede the Lease Sale of any parcels but merely asks for meaningful coordination moving forward.

The State strongly favors oil and gas leasing as an important addition to the State's economy. Please direct any other written questions regarding this correspondence to the Public Lands Policy Coordinating Office at the address below, or call to discuss any questions or concerns.

Sincerely,



Kathleen Clarke  
Director

cc: Sheri Wysong, Fluids Minerals Leasing Coordinator  
*Sent via electronic mail: [swysong@blm.gov](mailto:swysong@blm.gov)*